

## Moore, John (Matthew)

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**From:** Anthony, Susan <SAnthony@mmsd.com>  
**Sent:** Friday, October 20, 2017 8:56 AM  
**To:** Moore, John (Matthew)  
**Cc:** Richard S. Davis; Shafer, Kevin  
**Subject:** Milorganite matter /next steps

**Importance:** High

**Categories:** Record Saved - Shared

Good morning Matt: This confirms the message I just left on your voicemail. MMSD has done 3 studies in support of its position in the pending Milorganite inspection matter which we will be transmitting to you early next week. The studies are: (1) a correlation of the product temperature data between the current monitoring point and end of dryer; (2) fecal coliform data from additional monitoring points as previously discussed with the Region 5 staff; and (3) a study to test compliance with 40 CFR Part 503.32 (a) (3)(i)B, Alternative 1 for Meeting Class A requirements. All three studies confirm MMSD's compliance with pathogen reduction requirements. This last study is an alternate (additional) demonstration of compliance with the temperature requirements of Part 503. After you have had an opportunity to review these data, we intend to submit later next week, a counterproposal to your latest draft AO. Then we are hoping to meet (possibly the week of November 6?) to discuss the studies and the language of the AO. MMSD Executive Director Kevin Shafer will be in Israel on a trade mission with the Governor of Wisconsin and the WI Economic Development Corporation (along with representatives of the Milwaukee Water Council) from October 27 through November 4, so would not be available to meet with EPA until the week of November 6, and his presence is critical in the meeting. We are proceeding with this plan, but I'd like to touch base by phone at your convenience. I'm in the office all day today; Monday morning is our full Commission meeting, but the afternoon is free. Please call at your convenience. Thanks—Susan

Susan Anthony  
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